REMARKS

This is in response to the Office Action mailed November 7, 2007. In the Office Action, claims 1, 3, 4, 6-9 and 11-25 were pending and rejected. With this amendment, claims 7, 14, 15, 21 and 22 are amended; claims 8, 9 and 11-13 are canceled; and the remaining claims are unchanged in the application.

Section Six of the Office Action indicated that independent claim 1, among others, was rejected under 35 U.S.C. §102(b) as being anticipated by Nassiff et al. (U.S. Pat. No. 6,418,410 - hereinafter Nassiff). With respect to this rejection, the Office Action asserted, on page 7, that Nassiff teaches,

> "Wherein the recognition engine is adapted to determine if the user's pronunciation caused the error, and selectively modify a probability associated with an existing pronunciation (see col. 7, lines 55-66) (e.g. The use of a statistical quantity with the updating of a language model implies that a probability value is associated with a word when comparisons are made (see col. 6, lines 28-31))."

Respectfully, the Office Action confuses the distinction between a probability associated with a word, such as may be present in a language model, and a probability associated with an existing pronunciation, as recited in independent claim 1. As set forth in Applicants' previous response, Nassiff provides, in column 6, lines 28-32,

> "As is known by those skilled in the art, it should be understood that the language model consists of statistical information about word patterns. Accordingly, correcting the language model is not an acoustic correction, but a statistical correction."

The quoted passage, as well as the rest of the reference, teaches that the language model consists of statistical information about word patterns, and that the model accuracy can be improved by updating statistical information associated with

word patterns. The claim 1 limitation recites modifying a probability associated with an existing pronunciation. Nassiff does not teach or suggest modification of a probability with respect to an existing pronunciation. Accordingly, Applicants respectfully submit that independent claim 1 is neither taught nor suggested by Nassiff. Further, Applicants respectfully submit that dependent claims 3, 4 and 6 are allowable as well by virtue of their dependency, either directly or indirectly, from allowable independent claim 1.

Section Six of the Office Action also indicated that independent claim 7 was rejected under 35 U.S.C. §102(b) as being anticipated by Nassiff. Applicants have amended independent claim 7 to recite the subject matter previously set forth in dependent claims 12 and 13. Accordingly, Applicants respectfully submit that the rejection of claim 7 recited in Section Six may now be withdrawn. Applicants respectfully note that the subject matter previously set forth in dependent claims 12 and 13 was rejected in Section Eight of the Office Action under 35 U.S.C. §103(a) as being unpatentable over Nassiff in view of Hon et al. (U.S. Patent 5,852,801 - hereinafter Hon '801). Applicants respectfully note that the rejection of those claims in Section Eight relies on the same construction of the Nassiff reference, which construction does not accurately reflect the distinction between updating a language model and updating a pronunciation. Amended claim 7 now recites selectively learning the pronunciation. This is in distinct contrast to Nassiff, which updates the language model. Accordingly, Applicants respectfully submit that amended independent claim 7 is allowable over Nassiff and Hon, taken alone or in combination. Further, Applicants respectfully submit that dependent claims 14-23 are allowable as well by virtue of their dependency, either directly or indirectly, from an allowable independent claim.

Section Twelve of the Office Action indicated that independent claim 24 and dependent claim 25 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nassiff in view of Gould (EP 0773 532 A2). Applicants respectfully traverse this rejection. Section Twelve of the Office Action asserts that Nassiff provides the feature of claim 24 relative to inferring whether the change is a correction based at least partially upon the number of words changed. In this regard, the Office Action asserts,

> "Inferring whether the change is a correction (see col., lines 60-61) based at least partially upon the number of words changed (e.g. It is obvious to the reference that the number of words are taken into consideration to find out which words were changed (see col. 5, lines 58-61, where replacement words and dictated words are one or more words. The deletion or typing over makes the inferring obvious in order to determine which words were edited or corrected.)"

Respectfully, this indicates that the Office Action has not given proper effect to the claim language. Specifically, the claim language does not recite determining which words were changed by considering the number of words. Instead, claim 24 recites inferring whether the change is a correction based at least partially upon the number of words changed. As set forth in Applicants' specification and as discussed in the Nassiff reference itself, it is important to understand whether replacement text represents correction of a mis-recognition error rather than an edit. See Specification page 18, line 28 through page 19, line 2; and abstract of Nassiff. Independent claim 24 recites inferring the type of change based at least partially upon the number of words changed. Page 19 of Applicants' specification indicates that if the user changes a significant number of words in the dictated sentences, the user is probably editing based upon a change of mind. Accordingly, claim 24 is directed to

determining the number of words changed, and using that information, at least partially, to infer whether the change is a correction as opposed to editing. Neither Nassiff nor Gould teach the utilization of such information for such an inference. Accordingly, Applicants respectfully submit that independent claim 24 is allowable over Nassiff and Gould, taken alone or in combination. Further, Applicants respectfully submit that dependent claim 25 is allowable by virtue of its dependency from independent claim 24.

In conclusion, Applicants respectfully submit that the entire application is now in condition for allowance. Reconsideration and favorable action are respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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